

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
Jurisdictional Separations and Referral	)	CC Docket No. 80-286
To the Federal-State Joint Board	)	
	)	
Petition by Pioneer Telephone	)	
Cooperative, Inc. For Waiver of	)	
47 C.F.R. Sections 36.3, 36.123-126,	)	
36.141, 36.152-157, 36.191 and	)	
36.372-382 to Unfreeze Part 36	)	
Category Relationships	)	

**REPLY COMMENTS OF PIONEER TELEPHONE COOPERATIVE, INC.**

Pioneer Telephone Cooperative, Inc. (“Pioneer”) files its reply comments in response to comments filed regarding the most recent Further Notice of Proposed Rulemaking (“FNPRM”) in this proceeding.<sup>1</sup> Pioneer is particularly interested in this proceeding because its Petition to unfreeze its category relationships has been pending before the Commission since March 20, 2013.<sup>2</sup>

Pioneer supports the proposal in the Comments of the United States Telecom Association (“USTA”) that the limited number of carriers that have elected A-CAM support should be

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*In the Matter of Jurisdictional Separations and Referral to the Federal-State Joint Board*, CC Docket No. 80-286, Further Notice of Proposed Rulemaking, FCC 17-22 (Mar. 20, 2017) (FNPRM). 82 Fed. Reg. 18498, Apr. 4, 2017.

<sup>2</sup> Petition by Pioneer Telephone Cooperative, Inc. For Waiver of 47 C.F.R. Sections 36.3, 36.123-126, 36.141, 36.152-157, 36.191 and 36.372-382 to Unfreeze Part 36 Category Relationships, filed Mar. 22, 2013 (“Petition”). In the sixteen years since Pioneer voluntarily agreed to the freeze of its category relationships it has invested substantial capital to meet consumer demand for voice and broadband services, yet because of the freeze, the jurisdictional allocations of these investments are now severely skewed toward the intrastate jurisdiction

allowed to choose to immediately unfreeze their category relationships.<sup>3</sup> Pioneer is one of the 26 carriers with frozen categories that have elected A-CAM support. USTA correctly notes that effect of this election is that for carriers such as Pioneer only special access service costs are subject to the freeze. If the Commission allows Pioneer to unfreeze its category relationships its costs will be more accurately reflected.

In conclusion, Pioneer requests that the Commission include in its order extending the separations freeze explicit permission for carriers that have chosen A-CAM support to unfreeze their Part 36 category relationships.

Respectfully submitted

Pioneer Telephone Cooperative, Inc.

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<sup>3</sup> United States Telecom Association Comments, Apr. 17, 2017 at 6.